

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

COURTNEY LINDE, et al.

Plaintiffs,

-against-

ARAB BANK, PLC,

Defendant.

:
:
:
:
:
:
:
:
:
:
:
:

Case No. CV 04 2799 (BMC)(VVP) *and all related cases**

ARAB BANK'S FURTHER SUPPLEMENT TO THE JOINT PRE-TRIAL ORDER¹

10. FACT AND EXPERT WITNESS LIST

(b) Defendant's Listing of Witnesses

(ii) Case-In-Chief and Rebuttal Expert Witnesses

Schott, Paul Allen

Address: c/o DLA Piper LLP (US)
1251 Avenue of the Americas
New York, NY 10020

Mr. Schott is a former Assistant General Counsel of the United States Treasury Department, Chief Counsel of the Comptroller of the Currency, and Senior Attorney for the Federal Reserve Board. Mr. Schott is expected to testify as to United States banking regulations, including the content of banking industry standards and practices concerning AML and terrorist financing issues, and the Bank's compliance with such standards and

* *Litle, et al. v. Arab Bank, PLC*, No. CV-04-5449 (E.D.N.Y. 2004) (BMC)(VVP); *Almog, et al. v. Arab Bank, PLC*, No. CV-04-5564 (E.D.N.Y. 2004) (BMC)(VVP); *Coulter, et al. v. Arab Bank, PLC*, No. CV-05-365 (E.D.N.Y. 2005) (BMC)(VVP); *Afriat-Kurtzer, et al. v. Arab Bank, PLC*, No. CV-05-388 (E.D.N.Y. 2005) (BMC)(VVP); *Bennett, et al. v. Arab Bank, PLC*, No. CV-05-3183 (E.D.N.Y. 2005) (BMC)(VVP); *Roth, et al. v. Arab Bank, PLC*, No. CV-05-3738 (E.D.N.Y. 2005) (BMC)(VVP); *Weiss, et al. v. Arab Bank, PLC*, No. CV-06-1623 (E.D.N.Y. 2006) (BMC)(VVP); *Jesner, et al. v. Arab Bank, PLC*, No. CV-06-3869 (E.D.N.Y.) (BMC)(VVP); *Lev, et al. v. Arab Bank, PLC*, No. CV-08-3251 (E.D.N.Y. 2008) (BMC)(VVP); and *Agurenko, et al. v. Arab Bank, PLC*, No. CV-10-626 (E.D.N.Y. 2010) (BMC)(VVP).

¹ Plaintiffs have advised the Bank that they object to the timing of the Bank's supplementation and to its inclusion of expert witness testimony that previously was excluded by Judge Gershon.

practices. Mr. Schott's testimony will cover the period 1995-2004, as set forth in detail in his revised expert report dated January 31, 2012.

Nsouli, Marwan

Address: c/o DLA Piper LLP (US)
1251 Avenue of the Americas
New York, NY 10020

Mr. Nsouli is a former Vice-Governor of the Central Bank of Lebanon (1998-2008), and Chair of the National Coordinating Committee on Fighting Money Laundering (2002-2008). Mr. Nsouli is expected to testify on the development of anti-money laundering and anti-terrorist financing regulations in Lebanon, including promulgation in 2001 of Lebanon's first law proscribing money laundering and terrorism financing, and the Bank's compliance therewith, all as set forth in detail in his expert report dated January 21, 2011.

Cortbaoui, Chakib

Address: c/o DLA Piper LLP (US)
1251 Avenue of the Americas
New York, NY 10020

Mr. Cortbaoui is a Lebanese lawyer and leading authority on Lebanese banking law and regulation. He is a past president of the Beirut Bar Association, and was appointed as the Minister of Justice for Lebanon in 2012. Mr. Cortbaoui is expected to testify as to Lebanon's Special Investigation Committee (which investigates possible money laundering offenses and works with the United States and other nations to combat terrorism financing), and the legal and regulatory obligations of a Lebanese bank with regards to its customers, all as set forth in more detail in his expert report dated January 21, 2011.

Dagan, Yair

Address: c/o DLA Piper LLP (US)
1251 Avenue of the Americas
New York, NY 10020

Mr. Dagan has served as a consultant to Israeli financial institutions on the subjects of electronic banking and prohibited-party transfers. He also has served as Head of Foreign Trade Systems for Bank Hapoalim, and a systems analyst for the Israeli Defense Forces. He is expected to testify as to Arab Bank's correspondent relationship with Israeli banks, Israeli banking regulations under the Bank operated, and Israeli terror-designation lists, including regarding Zakat committees, as set forth in detail in his expert report dated February 17, 2011. Mr. Dagan also was identified as a fact witness.

Lacey, Robert

Address: c/o DLA Piper LLP (US)
1251 Avenue of the Americas
New York, NY 10020

Mr. Lacey is an historian and author, including an author of two books about Saudi Arabia. Mr. Lacey is expected to testify as to the legitimacy of the Saudi Arabian humanitarian efforts directed at helping Palestinians living in Gaza and the West Bank, including the Saudi Committee relief program at issue in this action. He is expected to opine on the background and origins of the Saudi Committee and respond to plaintiffs' assertion that the Saudi Committee was a HAMAS-supporting organization, all as set forth in detail in his expert reports dated February 4, 2011 and rebuttal report dated April 4, 2011.

Abed, George

Address: c/o DLA Piper LLP (US)
1251 Avenue of the Americas
New York, NY 10020

Mr. Abed a former Governor of Palestinian Monetary Authority ("PMA"), and a senior official at the IMF. He is expected to testify about the Welfare Association, the IMF, the PMA, the PMA's regulation of Arab Bank, the PMA's relationship with the United States and other governmental and non-governmental bodies, and Arab Bank's cooperation with the Central Bank of Israel. Mr. Abed also is expected to testify about bank privacy laws, as set forth in detail in his expert report dated February 4, 2011. Mr. Abed also was identified as a fact witness.

Gnehm, Edward

Address: c/o DLA Piper LLP (US)
1251 Avenue of the Americas
New York, NY 10020

Mr. Gnehm is a former U.S. Ambassador to Jordan. He is expected to testify about the Kingdom of Jordan's ownership interest in Arab Bank and the Kingdom's cooperation with the United States in opposing terrorism, as well as Arab Bank's role in the Jordanian economy. Mr. Gnehm also is expected to testify about the November 24, 2011 diplomatic cable sent from the U.S. Embassy in Jordan to the U.S. Department of State, as set forth in detail in his expert report dated February 21, 2011. Mr. Gnehm also was identified as a fact witness.

Rundell, David

Address: c/o DLA Piper LLP (US)
1251 Avenue of the Americas
New York, NY 10020

Mr. Rundell is a former US Charge d’Affaires & Deputy Chief of Mission in Saudi Arabia. He is expected to testify about Saudi Arabia’s cooperation with the United States in opposing terrorism and the Saudi Committee, as set forth in detail in his expert report dated February 17, 2011. Mr. Rundell also was identified as a fact witness.

Abington, Edward

Address: c/o DLA Piper LLP (US)
1251 Avenue of the Americas
New York, NY 10020

Mr. Abington is a former U.S. Consul General in Jerusalem. He is expected to testify about U.S. and foreign support for economic development and humanitarian assistance in the Palestinian Territories, as well as zakat committees and the banking sector operating in the Palestinian Territories, as set forth in detail in his expert report dated February 14, 2011. Mr. Abington also was identified as a fact witness.

Prof. Shlaim, Avi

Address: c/o DLA Piper LLP (US)
1251 Avenue of the Americas
New York , NY 10020

Prof. Shlaim is a noted professor of international relations at the University of Oxford, whose studies have focused on the Arab-Israeli Conflict. He is the author of extensive scholarly publications on the subject.

Prof. Shlaim is expected to testify concerning the background of the Oslo Accord, its unachieved goal in fostering economic development in the Palestinian Territories, the circumstances leading to the Second Intifada and the efforts of Saudi Arabia to address its harsh economic impact. He is also expected to testify about the relationship of Israel and Jordan in matters of anti-terrorism security, as set forth in detail in his expert report dated January 26, 2011.

12. STIPULATED FACTS AND EXHIBIT LISTS

We add as *DX 834* a White House release dated April 12, 2002. This document was initially produced as Exhibit J to the Declaration of Alan Howard dated February 6, 2008.

Dated: July 29, 2013

Respectfully submitted,

/s/

Shand S. Stephens

Kevin Walsh

Anthony P. Coles

DLA Piper LLP (US)

1251 Avenue of the Americas

New York, NY 10020

(212) 335-4500

Attorneys for Defendant Arab Bank plc